

Ms. Peggy L. Jenkins  
California Air Resources Board  
Research Division, Fifth Floor  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95814

Dear Ms. Jenkins,

We at Underwriters Laboratories, Inc. (UL) write to offer comment related to the rulemaking being undertaken by the state Air Resources Board (ARB) to address air cleaners, as directed by California Assembly Bill 2276. These comments are specific to the procedures for authorizing independent laboratories and certification organizations.

Section 41986(c)(2) of the chaptered legislation provides that ARB may proceed with rulemaking addressing,

“Procedures for authorizing independent laboratories or other approved certification organizations to verify products as meeting the emission concentration standard for ozone emissions from indoor air cleaning devices adopted by the state board.”

Currently extensive accreditation processes already exist for product certification bodies. Under the American National Standards Institute’s (ANSI) accreditation process, product certification bodies (many of which have internal testing laboratories) can receive accreditation for specific International Classification for Standards (ICS) codes, including codes related air quality.

As such, recognizing the financial implications of ARB establishing new accreditation procedures and the accreditation processes already in place for product certification bodies (which by definition are independent, third-party entities), Underwriters Laboratories, Inc. (UL) encourages ARB to require the following procedures for authorizing product certification bodies to verify products as meeting the emission concentration standards for ozone emissions from indoor air cleaning devices,

- 1) Submission of evidence of the product certification body's accreditation by the American National Standards Institute with either ICS Code 13.040.40 (Air quality - stationary source emissions) or ICS Code 13.040.99 (Air quality - other standards related to air quality) in their scope of accreditation, and
- 2) Evidence that the testing used as a basis for the certification is conducted in accordance with the appropriate test standard determined by ARB.

It is the belief of UL that these requirements will meet the needs of ARB in determining the credibility and capabilities of the independent laboratories and certification bodies to accurately and honestly test to the emission concentration standard for ozone emissions from indoor air cleaning devices to be adopted.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann M. Weeks". The ink is dark and the signature is fluid.

Ann M. Weeks  
Vice President, Government Affairs